

June 24, 2003
Marlene H. Dortch, Secretary
Secretary
Federal Communications Commission
445 12 St., S.W.
Washington, D.C. 20554

Re: CC Docket No. 96-128, NSD File No. L-99-34. Corrected Calculation.

Dear Ms. Dortch:

WorldCom, Inc., d/b/a/ MCI hereby submits a correction to a mathematical calculation contained in its June 23, 2003 Comments filed in response to the Further Notice of Proposed Rulemaking in the above-mentioned docket.

On page 11, the compensation which SBR "B" paid should have read "25" calls rather than "10" calls. The full corrected page 11 follows for the convenience of those wishing to substitute the corrected page.

I regret any inconvenience to the Commission or the parties resulting from this mistake.

Sincerely,

Larry Fenster

Larry Fenster
202-736-6513

more appropriate policy response when undercompensation was more widespread, would have required underlying carriers to supply PSPs the identities and toll free numbers associated with all of their SBR customers.

PSPs with smart phones would know the toll-free numbers called from their phones, the first carrier to whom calls made to those numbers were routed, and the total volume of calls routed to that first switch IXC. PSPs would also know the number of calls associated with compensation payments received from any SBR. This amount of information was insufficient to help a PSP determine whether an SBR payment was reasonable. For example, suppose the average completion rate for the industry is 70%. And suppose a PSP sent 100 calls to FS-IXC “A” and FS-IXC “A” routed 50 calls to SBR “B.” And suppose FS-IXC “A” compensated 35 calls and SBR “B” paid on 25 calls. The PSP sees an average completion of 60%, but since it doesn’t know how many calls were routed to SBR “B” it doesn’t know whether “A” or “B” is falling below the average completion rate for the industry. In this regard, the original rules did not contain sufficient FS-IXC reporting requirements.

E. Failure Of SBRs To Receive Originating ANI Played No Role In SBR Undercompensation of PSPs

Aside from contending that the voluntary identification problem was responsible for shortfalls in compensation, the Commission also identified the failure of FS-IXCs to pass originating automatic number identification (ANI) to SBRs as an important reason why SBRs were unable to track payphone-identified calls to completion, and therefore the reason the Commission shifted payphone compensation liability to the FS-IXC.²⁵ This assertion was never

²⁵ *Second Reconsideration Order*, &16, *FNPRM*, &25.